

Sternship Capital

Privacy Policy

Sternship Capital Pty Ltd ("Sternship Capital") is committed to providing professional services and respecting the privacy of your personal information. We are bound by the Privacy Act 1988 and its amendments (latest amendment dated May 2024 National Security Legislation Amendment (Comprehensive Review and Other Measures No. 3) Act 2024.

This Privacy Policy explains how we will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

Changes to our privacy policy

If at any time our Privacy Policy changes, the updated details will be available on our website <https://www.sternshipcapital.com.au/privacy-policy>. Any information we hold about you will be governed by the most current version of the privacy policy. Your continued use of our site, products and services indicates your acceptance of any changes.

Collection of personal information

Sternship Capital collects and maintains personal information that is necessary to enable us to deliver our services or products for our primary business activities.

In the normal course of our business, we only collect information about you when you provide it to us or it is provided to us under your authority.

We will collect personal information directly from you when you apply for a product or a service which we are obliged to do by law prior to providing you with a product or service.

On occasion we may collect personal information about you from third parties, for example credit reporting agencies, share registries or regulatory authorities. Information that we collect will be limited to that required to provide you with our services.

What type of information does Sternship Capital hold?

The type of information we collect and hold about you varies depending on the type of product or service you require.

The personal information we hold about you may include:

- Your personal details e.g. name, address, bank account details, TFN details etc; and
- Any other relevant information that you provide to us to enable us to provide you with a product or service.

We will only collect, maintain and use your personal information to adequately provide the products or services you have requested.

In most circumstances, the information that we hold about you has been provided to us by you or under your authority. If we have received information that is not required in order to provide services to you, we will either advise you that we hold this information or destroy it.

Other purposes for which we may need to collect and use your personal information will include:

- To comply with legislative and regulatory requirements (including the AML/CTF 2006 Act);
- To enable us to perform administrative operations such as accounting, record keeping and archival retrieval; and
- To enable us to contact you when conducting marketing.

You may choose not to provide us with your personal information. In this case we may not be able to deal with you including providing a financial product. Under the AML/CTF laws we must be able to identify our clients and verify that identity.

How does Sternship Capital use this information?

Where required, we collect, use and exchange your information so that we can:

- Establish your identity and respond to your queries;
- Make improvements and set the price and design for our products, services and marketing;
- Administer our products and services;
- Manage our relationship with you and keep you updated on important information, products and services that might interest you;
- Manage our risks and prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- Comply with our legal obligations; and
- We may also collect, use and exchange your information in other ways where permitted by law.

Direct marketing

Unless you direct us otherwise, we may use your personal information for direct marketing, and may share it with third party provider companies for the sole purpose of facilitating direct marketing. If you do not want to receive direct marketing, please tell us by emailing admin@sternshipcapital.com.au.

Sharing your information

Sternship Capital may share information with organisations that assist us to administer your investments or provide you with products and services including our internal and external service providers such as administrators.

The organisations receiving this information are not permitted to use your information for any purpose other than the specific purpose it was provided. Where we provide your personal information to outsourced service providers we may use from time to time to deliver our services or products, we will require our outsourced service providers to comply with your privacy rights and our policy requirements.

There are circumstances under which Sternship Capital may disclose your personal information such as:

- When the disclosure is required by law (for example, disclosed to the Australian Taxation Office, AUSTRAC or Centrelink);
- Authorised by law (such as where disclosure is necessary in the public interest or to protect our interests);
- In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. In the event that a sale of our business occurs, we may transfer your personal details to the purchaser of the business. As a client, you will be advised of such a transfer; and
- Responding to subpoenas, court orders and other legal processes.
- Where we act as either lead and/or joint lead managers we may share some of your personal information as part of the capital raising process with the company we are engaged with.

We will also disclose your personal information if you give your consent for us to do so. We do not sell mailing lists or provide client information to parties for anything unrelated to our business activities.

How does Sternship Capital handle a request for access to personal information?

Under the Australian Privacy Principles you are generally entitled to access the information we hold about you. Where you are entitled to access, the time we require to give you access will depend on the type of information requested. If we can we will answer your question immediately.

We will also try to answer you in the same way that you ask, for example, if you telephone to ask for the information we will if practicable, give you that information over the telephone. We will generally respond to a written request in writing.

Sometimes we will ask that you put your request in writing, for example, where you want copies of material or access to older information or files which are not current or it is necessary for us to retain record of your request.

We may also ask you to identify yourself to our satisfaction.

There are certain conditions under which we may refuse you access to your personal information, such as when your request may unreasonably impact upon another person's right to privacy. If we are entitled under the Australian Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

Website

Sternship Capital compliance with the Australian Privacy principles also applies to your access to our website.

Some areas of our website may enable you to be a client of Sternship Capital and you will be issued with a user name and password which are strictly for your personal use only.

Sternship Capital will not be liable for any acts that arise from the use of your user name and password whether authorised by you or not or are a result of your failure to maintain strict security protocols over the use of your login details. Please notify Sternship Capital immediately if you become aware of a breach of your security.

If you have objections to the Privacy Policy, you should not access or use the Site.

Storage and Security

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. Your personal information may be kept in hardcopy or electronic. In the event there is a significant privacy breach, at law we are required to notify you and also report the breach to the Office of the Australian Information Commissioner.

In the event you cease to be a client of Sternship Capital any personal information which we hold about you will be maintained in a secure manner for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed. Sternship Capital will ensure that any documents that are destroyed are done so in a secure manner.

Email Communication

As electronic communication becomes more and more part of our daily business lives Sternship Capital will use your email address that you have provided to contact you when necessary or to provide you with information you have requested.

We may also use your email address to alert you to marketing initiatives, newsletters, or events that may interest you.

If at any time you decide you do not wish to receive such marketing information you have the right to ask us not to send you any further material. You may do this by advising us by phone or by sending us an email with "Unsubscribe" in the subject line. Please allow two weeks for the instruction to take effect.

What if some of the information Sternship Capital holds is wrong?

Please tell us. We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it if requested, (or suggest alternative arrangements for updating our records).

If we disagree with you, we will give you our reasons and record your objections on file.

How do I make further enquiries or complain about a breach of privacy?

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us and direct your complaint to the Compliance Manager. We will acknowledge your complaint within 24 hours and respond to your complaint within 7 days.

Compliance Manager:
Sternship Capital Pty Ltd
Suite 4, 414 Rokeby Road,
Subiaco, WA, 6008

Telephone: +61 08 6169 2668
Email: admin@sternshipcapital.com.au

We will use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Office of the Australian Information Commissioner
1300 363 992, online at
www.oaic.gov.au
GPO Box 5218 Sydney NSW 2001